

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

VICKIE FREEMAN : **VIOLATIONS:**

: **18 U.S.C. § 371 (conspiracy to make**

: **false statements to federal firearms**

: **licensees - 1 count)**

: **18 U.S.C. § 922(a)(1)(A) (dealing in**

: **firearms without a license - 1 count)**

: **18 U.S.C. § 924(a)(1)(A) (making false**

: **statements to federal firearms licensees -**

: **7 counts)**

: **18 U.S.C. § 2 (aiding and abetting)**

: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The following businesses possessed federal firearms licenses (“FFLs”) and were authorized to deal in firearms under federal law:
 - a. Kayton Company, d/b/a Army&Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438;
 - b. Koehler International Inc., d/b/a Eagle Arms Sport Shop, 9331 Hamilton Boulevard, Breinigsville, Pennsylvania 18031, FFL# 8-23-20407;
 - c. Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line, 5581 Roosevelt Street, Whitehall, Pennsylvania 18052, FFL# 8-23-38928;

- d. Frank E. Repyneck, 5402 Chestnut Street, Emmaus, PA18049 FFL# 8-23-39022;
- e. Kathleen McGorry-Lowe, d/b/a Toonerville Junction, 522 West Maple Street, Allentown, Pennsylvania 18101, FFL# 8-23-21284;
- f. Robert T. Litzenberger, d/b/a The Golden Trigger, 358 B Lower Level Main Street, Emmaus, Pennsylvania 18049, FFL# 8-23-39331; and
- g. Vernell Mae Meyers, d/b/a Meyers Gun Shop, 705 Point Phillips Road, Bath, Pennsylvania 18014, FFL# 8-23-14699.

2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

3. The rules and regulations governing FFL holders require that a person seeking to purchase a handgun fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all her answers on Form 4473 are true and correct. A question on Form 4473 asks the prospective purchaser if he or she is the actual buyer of the firearm(s) listed on the form. The Form explains that to be an "actual buyer" one must be buying the firearm(s) for oneself or as a gift.

4. Another part of the Form 4473 requires that the prospective purchaser certify that all her answers on Form 4473 are true and correct. The prospective purchaser also certifies that she understands that making a false statement with respect to the purchase of the firearm(s) is a crime punishable as a felony.

5. A person who purchases a firearm for another person and falsely completes the Form 4473 is known as a "straw purchaser." Acting as a straw purchaser is

referred to as “lying and buying.”

6. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth.

7. From on or about July 30, 2001, through on or about July 30, 2002, in Lehigh and Northampton Counties, in the Eastern District of Pennsylvania, defendant

VICKIE FREEMAN

conspired and agreed with others known and unknown to the grand jury to commit offenses against the United States, that is, to knowingly make false statements with respect to the information required to be kept in the records of a federally licensed firearms dealer, specifically, the identity of the actual buyer of firearms, in violation of Title 18, United States Code, Section 924(a)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

8. M.L.B., a person known to the grand jury, arranged for defendant VICKIE FREEMAN to purchase handguns and a semi-automatic assault weapon from various Lehigh Valley federal firearms licensees for persons known and unknown to the grand jury.

9. In advance of the firearms purchases, M.L.B. was given cash by the actual purchasers of the firearms.

10. At M.L.B.’s direction, defendant VICKIE FREEMAN went to the federal firearms licensees and falsely represented on ATF Form 4473s that she was purchasing firearms

for herself, when, in fact, she was purchasing them for M.L.B., who then supplied them to the pre-arranged actual purchasers.

11. M.L.B. and defendant VICKIE FREEMAN used the proceeds from Freeman's straw purchases to, among other things, pay household expenses.

OVERT ACTS

In furtherance of the conspiracy, defendant VICKIE FREEMAN and M.L.B., a person known to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about July 30, 2001:

1. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

2. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Army & Navy Store.

3. At the Army & Navy Store, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Ruger 9mm pistol.

4. At the direction of M.L.B., defendant VICKIE FREEMAN then purchased a Ruger, model P95D, 9mm pistol, serial number 314-66603, from the Army & Navy Store.

5. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

6. After leaving the Army & Navy Store with the Ruger pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury.

FREEMAN left the Ruger pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about August 3, 2001:

7. M.L.B. arranged with R.S., a person known to the grand jury, to supply that person a firearm.

8. M.L.B. and R.S. drove defendant VICKIE FREEMAN to the Army & Navy Store.

9. At the Army & Navy Store, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Keltec 9mm pistol.

10. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Keltec, model P-11-B, 9mm pistol, serial number 109092, from the Army & Navy Store.

11. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Keltec pistol.

12. After leaving the Army & Navy Store with the Keltec pistol, defendant VICKIE FREEMAN gave the pistol to R.S. and was driven home by M.L.B. and R.S.

On or about December 19, 2001:

13. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

14. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Army & Navy Store.

15. At the Army & Navy Store, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Heritage Arms .40 caliber pistol.

16. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Heritage Arms, model Stealth Shadow C4200, .40S&W caliber pistol, serial number B04908.

17. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Heritage Arms pistol.

18. After leaving the Army & Navy Store with the Heritage Arms pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Heritage Arms pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about December 20, 2001:

19. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

20. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Army & Navy Store.

21. At the Army & Navy Store, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Ruger 9mm pistol.

22. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Ruger, model P95D, 9mm pistol, serial number 314-49877, from the Army & Navy Store.

23. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

24. After leaving the Army & Navy Store with the Ruger pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Ruger pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about December 29, 2001:

25. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

26. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to The Golden Trigger.

27. At The Golden Trigger, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Keltec 9mm pistol and a KBI .380 caliber pistol.

28. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Keltec, model P-11, 9mm pistol, serial number 19238, and a KBI, model FEG, .380 caliber pistol, serial number N37317, from The Golden Trigger.

29. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Keltec and KBI pistols.

30. After leaving The Golden Trigger with the Keltec and KBI pistols, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Keltec and KBI pistols in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about January 14, 2002:

31. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

32. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the PLEOA Firing Line.

33. At the PLEOA Firing Line, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Taurus .380 caliber pistol.

34. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Taurus, model PT138, .380 ACP caliber pistol, serial number KSF72638, from the PLEOA Firing Line.

35. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Taurus pistol.

36. After leaving the PLEOA Firing Line with the Taurus pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Taurus pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about March 19, 2002:

37. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

38. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the PLEOA Firing Line.

39. At the PLEOA Firing Line, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Charles Daly .45 caliber pistol.

40. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Charles Daly, model 1911 A1, .45 ACP caliber pistol, serial number 733107, from the PLEOA Firing Line.

41. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Charles Daly pistol.

42. After leaving the PLEOA Firing Line with the Charles Daly pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Charles pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about March 19, 2002:

43. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

44. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Toonerville Junction.

45. At the Toonerville Junction, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Maadi AK-47 assault rifle.

46. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Maadi, model AK-47, 7.62mm x 39 caliber semi-automatic assault rifle, serial number 21867, from the Toonerville Junction.

47. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Maadi AK-47 assault rifle.

48. After leaving the Toonerville Junction with the Maadi AK-47 assault rifle, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Maadi AK-47 assault rifle in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about March 19, 2002:

49. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

50. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to The Golden Trigger.

51. At The Golden Trigger, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Ruger 9mm pistol.

52. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Ruger, model P94, 9mm pistol, serial number 308-21072, from The Golden Trigger.

53. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

54. After leaving The Golden Trigger with the Ruger pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Ruger pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about March 25, 2002:

55. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

56. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the PLEOA Firing Line.

57. At the PLEOA Firing Line, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Taurus 9mm pistol.

58. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Taurus, model PT 92, 9mm pistol, serial number TLF56029D.

59. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Taurus pistol.

60. After leaving the PLEOA Firing Line with the Taurus pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Taurus pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about March 25, 2002:

61. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

62. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Eagle Arms Sport Shop.

63. At the Eagle Arms Sport Shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Glock 9mm pistol.

64. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Glock, model 26, 9mm pistol, serial number CCV394, from the Eagle Arms Sport Shop.

65. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Glock pistol.

66. After leaving the Eagle Arms Sport Shop with the Glock pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Glock pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about April 4, 2002:

67. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

68. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

69. At Frank E. Repyneck's gun shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Cobray 9mm pistol.

70. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Cobray, model PM11, 9mm pistol, serial number 940023007, from Frank E. Repyneck's gun shop.

71. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Cobray pistol.

72. After leaving Frank E. Repyneck's gun shop with the Cobray pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Cobray pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about May 18, 2002:

73. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

74. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

75. At Frank E. Repyneck's gun shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Ruger 9mm pistol.

76. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Ruger, model P95, 9mm pistol, serial number 314-41167, from Frank E. Repyneck's gun shop.

77. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

78. After leaving Frank E. Repyneck's gun shop with the Ruger pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Ruger pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about May 28, 2002:

79. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

80. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

81. At Frank E. Repyneck's gun shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Cobray 9mm pistol.

82. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Cobray, model 9M11, 9mm pistol, serial number 940023168, from Frank E. Repyneck's gun shop.

83. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Cobray pistol.

84. After leaving Frank E. Repyneck's gun shop with the Cobray pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Cobray pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about July 2, 2002:

85. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

86. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

87. At Frank E. Repyneck's gun shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Ruger 9mm pistol.

88. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Ruger, model P85, 9mm pistol, serial number 303-06129, from Frank E. Repyneck's gun shop.

89. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

90. After leaving Frank E. Repyneck's gun shop with the Ruger pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Ruger pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about July 11, 2002:

91. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

92. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

93. At Frank E. Repyneck's gun shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Hi-Point 9mm pistol.

94. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Hi-Point, model C9, 9mm pistol, serial number P220260, from Frank E. Repyneck's gun shop.

95. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Hi-Point pistol.

96. After leaving Frank E. Repyneck's gun shop with the Hi-Point pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Hi-Point pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about July 13, 2002:

97. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

98. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

99. At Frank E. Repyneck's gun shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Hi-Point 9mm pistol.

100. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Hi-Point, model C9, 9mm pistol, serial number P220262, from Frank E. Repyneck's gun shop.

101. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Hi-Point pistol.

102. After leaving Frank E. Repyneck's gun shop with the Hi-Point pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Hi-Point pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about July 15, 2002:

103. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

104. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Meyers Gun Shop.

105. At Meyers Gun Shop, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Taurus 9mm pistol.

106. At the direction of M.L.B., defendant VICKIE FREEMAN purchased a Taurus, model PT111, 9mm pistol, serial number TUJ03222, from Meyer's Gun Shop.

107. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Taurus pistol.

108. After leaving Meyers Gun Shop with the Taurus pistol, defendant VICKIE FREEMAN was driven home by M.L.B. and the person unknown to the grand jury. FREEMAN left the Taurus pistol in the car, and M.L.B. and the person unknown to the grand jury drove away.

On or about July 30, 2002:

109. M.L.B. arranged with a person unknown to the grand jury to supply that person a firearm.

110. M.L.B. and the person unknown to the grand jury drove defendant VICKIE FREEMAN to The Golden Trigger.

111. At The Golden Trigger, M.L.B. instructed defendant VICKIE FREEMAN to purchase a Glock 9mm pistol.

112. At the direction of M.L.B., defendant VICKIE FREEMAN attempted to purchase a Glock, model 25, 9mm pistol, from The Golden Trigger.

113. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she would be the actual buyer of the Glock pistol.

114. The Golden Trigger declined to complete the sale of the Glock pistol, and M.L.B. and VICKIE FREEMAN left the store without the Glock pistol.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about July 30, 2001 through on or about July 30, 2002, in the Eastern District of Pennsylvania, and elsewhere, defendant

VICKIE FREEMAN

willfully engaged, and aided and abetted the willful engaging, in the business of dealing in firearms, without being licensed to do so under the provisions of Chapter 44, Title 18 United States Code, by buying and selling to others approximately 19 firearms, that is:

1. a Ruger, model P95D, 9mm pistol, serial number 314-66603;
2. a Keltec, model P-11-B, 9mm pistol, serial number 109092;
3. a Heritage Arms, model Stealth Shadow C4200, .40S&W caliber pistol, serial number B04908;
4. a Ruger, model P95D, 9mm pistol, serial number 314-49877;
5. a Keltec, model P-11, 9mm pistol, serial number 19238;
6. a KBI, model FEG, .380 caliber pistol, serial number N37317;
7. a Taurus, model PT138, .380 ACP caliber pistol, serial number KSF72638;
8. a Charles Daly, model 1911 A1, .45 ACP caliber pistol, serial number 733107;
9. a Maadi, model AK-47, 7.62mm x 39 caliber semi-automatic assault rifle, serial number 21867;
10. a Ruger, model P94, 9mm pistol, serial number 308-21072;

11. a Taurus, model PT 92, 9mm pistol, serial number TLF56029D;
12. a Glock, model 26, 9mm pistol, serial number CCV394;
13. a Cobray, model PM11, 9mm pistol, serial number 940023007;
14. a Ruger, model P95, 9mm pistol, serial number 314-41167;
15. a Cobray, model PM11, 9mm pistol, serial number 940023168;
16. a Ruger, model P85, 9mm pistol, serial number 303-06129;
17. a Hi-Point, model C9, 9mm pistol, serial number P220260;
18. a Hi-Point, model C9, 9mm pistol, serial number P220262; and
19. a Taurus, model PT111, 9mm pistol, serial number TUJ03222.

In violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNTS THREE THROUGH NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1.d, 1.f, and 1.g and 2 through 6 and Overt Acts 73 through 114 of Count One are incorporated here.

2. On or about each of the dates specified in the chart below, in the Eastern District of Pennsylvania, defendant

VICKIE FREEMAN

knowingly made a false statement and representation with respect to the information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition or attempted acquisition of each of the firearms listed in the table below, from the federally licensed firearms dealers listed in the table below, in that the defendant FREEMAN certified on the Department of Treasury Forms 4473, Firearms Transaction Record, that she was or would have been the actual buyer of the firearms listed in the table below, when in fact, as she knew, this statement was false and fictitious.

COUNT	DATE AND FFL	FIREARM(S) PURCHASED
3	May 18, 2002 Frank E. Repyneck	1 Ruger, model P95, 9mm pistol, serial number 314-41167
4	May 28, 2002 Frank E. Repyneck	1 Cobray, model PM11, 9mm pistol, serial number 940023168
5	July 2, 2002 Frank E. Repyneck	1 Ruger, model P85, 9mm pistol, serial number 303-06129

COUNT	DATE AND FFL	FIREARM(S) PURCHASED
6	July 11, 2002 Frank E. Repyneck	1 Hi-Point, model C9, 9mm pistol, serial number P220260
7	July 13, 2002 Frank E. Repyneck	1 Hi-Point, model C9, 9mm pistol, serial number P220262
8	July 15, 2002 Meyers Gun Shop	1 Taurus, model PT111, 9mm pistol, serial number TUJ03222
9	July 30, 2002 The Golden Trigger	None - purchase denied: attempted purchase of 1 Glock, model 26, 9mm pistol

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 371
922(a)(1)(A), and 924(a)(1)(A), as set forth in this indictment, defendant

VICKIE FREEMAN

shall forfeit to the United States of America the firearms involved in the commission of these
offenses, including, but not limited to:

1. a Ruger, model P95D, 9mm pistol, serial number 314-66603;
2. a Keltec, model P-11-B, 9mm pistol, serial number 109092;
3. a Heritage Arms, model Stealth Shadow C4200, .40S&W caliber pistol,
serial number B04908;
4. a Ruger, model P95D, 9mm pistol, serial number 314-49877;
5. a Keltec, model P-11, 9mm pistol, serial number 19238;
6. a KBI, model FEG, .380 caliber pistol, serial number N37317;
7. a Taurus, model PT138, .380 ACP caliber pistol, serial number
KSF72638;
8. a Charles Daly, model 1911 A1, .45 ACP caliber pistol, serial number
733107;
9. a Maadi, model AK-47, 7.62mm x 39 caliber semi-automatic assault rifle,
serial number 21867;
10. a Ruger, model P94, 9mm pistol, serial number 308-21072;
11. a Taurus, model PT 92, 9mm pistol, serial number TLF56029D;

12. a Glock, model 26, 9mm pistol, serial number CCV394;
13. a Cobray, model PM11, 9mm pistol, serial number 940023007;
14. a Ruger, model P95, 9mm pistol, serial number 314-41167;
15. a Cobray, model PM11, 9mm pistol, serial number 940023168;
16. a Ruger, model P85, 9mm pistol, serial number 303-06129;
17. a Hi-Point, model C9, 9mm pistol, serial number P220260;
18. a Hi-Point, model C9, 9mm pistol, serial number P220262; and
19. a Taurus, model PT111, 9mm pistol, serial number TUJ03222.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney